

From:

Sent: 19 July 2026 14:59

To: NCC - Planning <planning@newport.gov.uk>

Cc:

Subject: Objection to Planning application 26/0456 - Change of use from dwelling to 6 bed/7 person HMO - 51 Tennyson Road

Dear Sirs,

Please see below an objection from my parents -in - law (who I am sending on their behalf).

We live at the property 60 Tennyson Road – directly opposite the proposed development and object to the planning application for the following substantive reasons:

Overdevelopment, Amenity and Placemaking

The proposal represents an over-intensive, bedroom-led form of development that prioritises the maximisation of occupancy over the provision of high-quality living accommodation. The substantial extension is primarily intended to facilitate additional bedrooms, increasing occupancy to seven residents and fundamentally altering the property's function from a family dwelling to an intensified HMO.

The development would significantly increase the building footprint whilst reducing usable private amenity space, leaving limited outdoor space relative to the scale of occupation proposed. The combination of intensified occupation, inadequate communal provision and reduced amenity space would result in a cramped form of development that is out of character with the surrounding residential area.

The enlarged property would generate levels of activity, noise, refuse and vehicle movements materially greater than those associated with the existing dwelling, to the detriment of residential amenity and local character. The proposed development does not relate positively to the distinctive character and the amenity of the locality or

make a positive contribution to the sense of identity. It will result in the loss of a single family dwelling in the locality with associated negative amenity and social cohesion efforts.

The proposal therefore fails to accord with the placemaking principles of Planning Policy Wales (Edition 12), which seek high-quality development and advise against maximising development capacity at the expense of amenity, design quality and well-being. Accordingly, the proposal is contrary to PPW 12, Future Wales and Policies SP1, GP2 and H8 of the Newport Local Development Plan.

Substandard living conditions

The proposed ground floor plan shows a combined kitchen/lounger which provides 30m² of floor area, although this exceeds the bare minimum council standard of 24m², the kitchen and lounge area are still considered to provide a cramped, unpleasant living environment. As per HMO regulations the kitchen must be provided with 2 cookers, 2 refrigerators with freezer, 2 sinks! Presumably a washing machine? Which doesn't leave much space for storage. Consequently, much of the available floor space would be occupied by essential fixtures and fittings, resulting in limited usable communal living space and an over-intensive arrangement. The kitchen does not provide sufficient storage, preparation and cooking space for 7 individuals.

The living rooms would need to provide the only dining room area together with sitting and leisure facilities. This will result in cramped communal space reducing the quality and functionality of the accommodation. The plans do not indicate any storage cupboard spaces to store hoovers, ironing boards, cleaning equipment.

The bedroom spaces are small, therefore providing limited storage and relaxation needs. Bedroom 2 is only 11m² and the en-suites are small – not offering adequate washing and drying facilities. Sharing limited personal space would result in significant lack of privacy and a cramped and unpleasant living conditions for the occupiers.

Bin/Recycling/garden waste storage

The application fails to demonstrate adequate refuse and recycling storage for a 7-bedroom HMO. The increased level of occupation will generate significantly greater volumes of waste than a single dwellinghouse, yet no details have been provided

regarding the location, capacity or design of bin storage facilities. In the absence of such information, it cannot be concluded that the development complies with the Council's Waste Storage and Collection SPG or that refuse can be stored and collected without detriment to visual amenity, residential amenity or the character of the area

Taken together, the limited communal facilities, lack of dedicated storage, constrained bedroom layouts and small en-suite facilities indicate that the proposal would result in an over-intensive form of occupation that would fail to provide a satisfactory standard of residential amenity for future residents. The development would therefore create cramped and poor-quality living conditions contrary to the objectives of good design and the provision of high-quality accommodation.

External Building Practicalities and Building Regulations

The proposed side extension is shown constructed directly adjacent to the boundary with No. 53 Tennyson Road in order to maximise internal floor space. Given the significant difference in ground levels between the application site and the neighbouring property, concerns arise regarding the practical construction of the extension and the potential impact on the stability of neighbouring land and structures.

It is highly likely that substantial retaining and waterproofing works would be required along the boundary. Such engineering solutions would inevitably reduce the internal dimensions of the extension and may result in the proposed room sizes and floor areas being materially smaller than those indicated on the submitted plans. The applicant should therefore provide sufficient structural information to demonstrate that the accommodation shown can be delivered in practice whilst maintaining compliance with the Council's HMO standards.

The plans also indicate the removal of the existing chimney breast within the ground floor lounge, which forms part of the party wall with No. 49 Tennyson Road. However, no details have been provided showing how the remaining chimney structure above would be supported. The chimney breast appears to project into the roof space adjacent to Bedroom 6 and could affect the usable floor area available. If the chimney is to remain, it should be accurately shown on the plans. Without structural details, it cannot be confirmed that the accommodation can be delivered as proposed.

Concerns also arise regarding the first-floor landing arrangement. The plans appear to show two steps immediately outside the door to Bedroom 5, together with a reduced landing width of approximately 600mm. This arrangement raises concerns in respect of safety, accessibility and the practicality of the internal layout.

Furthermore, the submitted plans do not identify the location of the boiler or any associated plant and equipment. Given the constrained nature of the communal living space, it is unclear where such equipment could be accommodated without further reducing the available living area.

Whilst Building Regulations are a separate consent regime, the proposed accommodation has been designed to minimum or near-minimum space standards. It is therefore important that the Council is satisfied that the development can accommodate all structural, fire safety, insulation, ventilation and servicing requirements without compromising the room sizes and amenity standards shown on the plans.

Accordingly, it is **requested that the Council seek input from Building Control, or otherwise require the applicant to demonstrate that the proposed accommodation can be constructed in compliance with Building Regulations** whilst retaining the floor areas and layouts shown on the submitted drawings. In the absence of such evidence, there is insufficient certainty that the development can be delivered as proposed or that it would provide an acceptable standard of accommodation for future occupiers.

Biodiversity

The application fails to demonstrate that the development would maintain and enhance biodiversity or secure a net benefit for biodiversity as required by Planning Policy Wales (Edition 12) and Section 6 of the Environment (Wales) Act 2016.

Whilst the submitted Green Infrastructure Statement proposes enhancement measures such as bird boxes, it fails to establish an adequate ecological baseline, quantify habitat losses and gains, or demonstrate how the biodiversity mitigation hierarchy has been applied. Furthermore, the proposal would reduce existing garden habitat and permeable green space, and insufficient evidence has been provided to demonstrate that the proposed measures would outweigh these losses or contribute positively to ecosystem resilience.

In the absence of robust evidence demonstrating a measurable biodiversity net benefit, the Local Planning Authority cannot conclude that the proposal complies with PPW 12, Future Wales, Section 6 of the Environment (Wales) Act 2016, and Policy GP5 of the Newport Local Development Plan.

Bats and Protected Species

There is evidence of bats regularly foraging and commuting within the vicinity of the site and the surrounding area (see attached photographs taken on 14/07/2026). Given that all bat species and their roosts are protected under wildlife legislation, it is essential that the potential impacts of the proposed development on bats and their habitats are properly assessed prior to the determination of the application.

Planning Policy Wales requires local planning authorities to maintain and enhance biodiversity and to apply the precautionary principle where protected species may be affected by development. The potential presence of protected species is a material planning consideration and must be adequately considered before planning permission is granted.

In this case, insufficient ecological information has been submitted to demonstrate that the proposed development would not adversely affect bats, including potential roosting opportunities within the building, commuting routes or nearby foraging habitat. The recorded bat activity in the locality indicates that bats are actively using the area and that further ecological investigation is therefore justified.

Furthermore, the property appears to be vacant and in a deteriorated condition, which may increase its suitability for use by roosting bats and other protected species. The site and its curtilage may also have the potential to support other species of conservation concern, including reptiles.

Accordingly, it is requested that the Council requires the applicant to undertake an appropriate ecological assessment by a suitably qualified and licensed ecologist prior to determining the application. At a minimum, this should include a Preliminary Roost Assessment, together with any further emergence, re-entry or activity surveys identified as necessary by that assessment.

In the absence of such survey work, there is insufficient information to enable the Council to properly assess the potential impacts of the development on protected species or to discharge its statutory duties in relation to biodiversity conservation. The application should therefore not be determined until adequate ecological information has been submitted and appropriately assessed

Parking

The proposed seven-person HMO is required to provide seven off-street parking spaces in accordance with Newport City Council's adopted parking standards. The application fails to provide the required level of parking and no robust evidence has been submitted to justify a departure from the adopted standards.

The resulting shortfall would likely increase demand for on-street parking, leading to additional parking pressure, inconvenience to existing residents and potential harm to the safe and efficient operation of the local highway network. The attached resident's parking survey (photos 07.07.2026- 14/07/2026) and off road parking capacity plan demonstrates that parking stress already exists within the area and that additional demand generated by the proposal cannot be satisfactorily accommodated.

The failure to provide adequate parking further reinforces the conclusion that the proposal represents an overdevelopment of the site, seeking to maximise occupancy without providing the infrastructure necessary to support that level of occupation. The proposal is therefore contrary to Policy T4 of the Newport Local Development Plan and the Council's adopted Parking Standards.

Objection to Newport Highway Officer's response

We object to the Newport Highway Officers response to this proposal.

It is noted that the assessment identifies a theoretical increase in parking demand from 3 spaces associated with the existing dwelling to 7 spaces associated with the proposed HMO, resulting in an additional demand of 4 spaces. The adopted Newport Parking Standards SPG establishes these parking requirements as the Council's benchmark for assessing parking demand arising from development proposals and seeks to ensure sufficient parking provision to avoid overspill parking on the public highway.

The Highway Authority's conclusion relies substantially on the general assumption that HMOs do not generate high levels of car ownership. However, the adopted SPG does not provide for a reduction in parking requirements on the basis of assumed HMO occupancy characteristics, and the recognised parking standard remains the appropriate starting point for assessing the likely impact of development.

Furthermore, the Highway Authority acknowledges that the submitted parking survey is not fully compliant with the Council's accepted survey methodology. The survey lacks sufficient detail and does not include independently verifiable, time-stamped evidence. It does not constitute a robust assessment of parking stress or available

capacity within the surrounding highway network. Us, as residents have undertaken a parking survey, which disputes the findings of the applicant's parking survey.

Given that the proposal would result in an identified increase in parking demand and that the supporting parking survey has not been undertaken in accordance with the Council's accepted methodology, there remains insufficient evidence to demonstrate that the additional parking demand can be accommodated without resulting in overspill parking or increased pressure on existing on-street parking provision. This is particularly relevant given that the stated purpose of the adopted Parking Standards SPG is to ensure adequate parking provision and avoid vehicles parking on-street in a manner that could contribute to congestion, inconvenience or highway safety concerns.

In addition, whilst the Highway Authority suggests that cycle parking details could be secured by condition, the submitted application does not currently demonstrate compliance with the Council's requirements for secure cycle parking provision. Appropriate cycle storage should be secured to support sustainable travel choices and mitigate the transport impacts associated with the intensification of the use.

The application does not include details of cycle parking provision. The Council's adopted Sustainable Travel SPG requires Houses in Multiple Occupation to provide cycle parking at a rate of 1 secure long-stay cycle space per 2 bedrooms. Accordingly, the proposed 7-bedroom HMO should provide **a minimum of 4 secure ($7 / 2 = 3.5$ rounded up to 4) and covered cycle parking spaces**. In the absence of details demonstrating the location, design, dimensions and capacity of the cycle store, it cannot be confirmed that the proposal complies with the requirements of the Sustainable Travel SPG.

Details should demonstrate a suitably sized covered and secure cycle store (typically around 5–6m²) capable of accommodating 4 bicycles with adequate manoeuvring space. Interestingly, the Newport SPG specifically states that: "A garage can also be identified for cycle storage, however it cannot also be declared as a car parking space (unless the applicant can provide sufficient justification that it is suitable for both).’ However as the existing garage area is proposed to be lost to a bedroom space – therefore the cycle provision is presumably to be provided to the front garden area, as there is no side access available or access the rear. If the garage area was to be retained this could provide the cycle parking space required.

Cumulative impact of the front garden cycling and refuse storage requirements

The front garden would be required to accommodate a number of competing functions, including landscaping, biodiversity enhancements, refuse and recycling

storage, cycle storage and access arrangements. However, no details have been provided demonstrating how these requirements can be satisfactorily accommodated within the limited space available. The loss of the garage, combined with the absence of side access to the rear, appears to necessitate the provision of refuse storage and cycle parking within the front garden. When considered alongside the need to retain or enhance biodiversity following the removal of existing vegetation, it is difficult to see how these competing requirements can be accommodated without creating a cluttered and visually intrusive frontage. The application fails to demonstrate that an attractive, functional and biodiverse frontage can be achieved. As such, insufficient information has been provided to assess the impact of the proposal on visual amenity, placemaking and biodiversity.

Conclusion

For the reasons set out above, the proposed development should be refused on the basis that :

- It constitutes an over-intensive form of HMO accommodation that seeks to maximise occupancy at the expense of design quality, residential amenity, parking provision, biodiversity and overall placemaking.
- The proposal would result in a cramped and poor-quality living environment for future occupiers, fails to demonstrate that adequate communal facilities and cycle storage can be provided, and raises significant concerns regarding meeting building regulations standards and whether the practical deliverability of achieving the accommodation shown on the submitted plans can in reality be met.
- Insufficient evidence has been provided to demonstrate that the development can be accommodated without exacerbating existing parking pressures within the surrounding area. The proposal fails to comply with the Council's adopted Parking Standards and the submitted parking survey has been acknowledged by the Highway Authority as falling short of the Council's accepted methodology.
- The application also fails to provide adequate ecological information to enable the Local Planning Authority to properly assess the impacts of the development on biodiversity and protected species. In the absence of a robust ecological assessment, including appropriate bat surveys and demonstrating how net gain for biodiversity will be achieved. The Council cannot be satisfied that its duties under Section 6 of the Environment (Wales) Act 2016 have been met.

Taken as a whole, the proposal has not demonstrated compliance with the requirements of Planning Policy Wales, the Newport Local Development Plan, the Council's adopted Parking Supplementary Planning Guidance, or the placemaking principles that underpin sustainable development in Wales.

We hope this information has been informative and would welcome further engagement with Newport Planning department on the proposal. If any further clarification on our points raised is required please get in touch.

Yours Sincerely
